

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

| | | |
|---|---|-------------------------------------|
| THERESA BROWN, individually and as | : | Case No. 2:17-cv-00558 |
| a representative of a class of participants | : | |
| and beneficiaries on behalf of the Andrus | : | Judge Algenon L. Marbley |
| Wagstaff PC 401(k) Profit Sharing Plan | : | |
| and all other similarly situated individual | : | Magistrate Judge Chelsey M. Vascura |
| account retirement plans, | : | |
| | : | |
| Plaintiffs, | : | |
| | : | |
| v. | : | |
| | : | |
| NATIONWIDE LIFE INSURANCE | : | |
| COMPANY, et al., | : | |
| | : | |
| Defendants. | : | |

**DEFENDANT NATIONWIDE’S NOTICE OF DISCLOSURE OF EXPERT WITNESSES
FOR PHASE ONE CLASS CERTIFICATION DISCOVERY**

Pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, and pursuant to the Court’s January 15, 2019 and March 14, 2019 Orders, Defendants Nationwide Life Insurance Company, Nationwide Bank, and Nationwide Trust Company, FSB (collectively, “Nationwide”) hereby provide notice that Nationwide has made the following disclosure of expert witnesses regarding Phase 1 class certification discovery to plaintiff’s counsel:

1. Bruce A. Strombom
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Managing Principal
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It is expected that Dr. Strombom will testify to the facts and opinions set forth in his report, which is being produced to plaintiff’s counsel along with this notice of disclosure.

Respectfully submitted,

/s/ Michael H. Carpenter

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed electronically on April 5, 2019. Notice was sent by operation of the Court's electronic filing system to all other counsel who have entered an appearance and any parties who have entered an appearance through counsel. The parties may access this filing through the Court's ECF system.

/s/ Michael H. Carpenter
*Trial Attorney for Defendants Nationwide Life
Insurance Company, Nationwide Bank, and
Nationwide Trust Company, FSB*